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**AGNES LAWSON, et.al.,**

**Plaintiffs,**

**v.**

**PRAXAIR DISTRIBUTION MID-  
ATLANTIC, LLC, et.als.,**

**Defendants.**

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: **UNITED STATES DISTRICT COURT**  
: **DISTRICT OF NEW JERSEY**  
:  
: **Civil Action No. 16-2435 (BRM)**  
:  
: **PRETRIAL SCHEDULING ORDER**  
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**THIS MATTER** having come before the Court for a scheduling/status conference on September 28, 2017; and the Parties having subsequently submitted proposed discovery schedules (dkt. nos. 94 and 96); and the Court having considered the parties' proposals; and good cause appearing for the entry of this Order:

**IT IS on this 26th day of October, 2017**

**ORDERED THAT:**

**I. FACT DISCOVERY**

1. All parties must conduct discovery expeditiously and diligently. In addition, all discovery conducted must be proportional to the needs of the case considering the factors set forth in Fed. R. Civ. P. 26(b)(1).
2. Electronic Discovery must be complete by **March 2, 2018**.
3. Fact Discovery, including any non-party depositions, must be complete by **August 31, 2018**. No discovery is to be issued or conducted after this date.
4. No objections to questions posed at depositions shall be made other than as to lack of foundation, form or privilege. *See Fed.R.Civ.P. 32(d)(3)(A)*. No instruction not to answer shall be given unless a privilege is implicated.
5. Any motion to amend the pleadings or to join new parties, whether by amended or third party complaint, must be filed by **June 1, 2017**.
6. Any party intending to file a dispositive motion must first seek leave of the Court by way

of a letter application. All calendar or dispositive motions, if permitted, shall comply with L.Civ.R. 7.1(b) and 78.1.

7. Counsel must meet and confer in a good faith effort to resolve any discovery or case management dispute before bringing such dispute to the attention of the Court. *See* L.Civ.R. 16.1(f)(1). Any unresolved disputes must be brought to the Court's attention promptly by a joint letter to the undersigned.
8. No discovery motion or motion for sanctions for failure to provide discovery shall be made without prior leave of Court.

## II. EXPERTS

9. Plaintiffs' expert disclosures and reports (liability and damages) must be served by **October 30, 2018**. All such reports must be in the form and content required by Fed.R.Civ.P. 26(a)(2)(B).
10. Defendants' expert disclosures and reports must be served by **November 30, 2018**. All such reports shall be in the form and content as described above.
11. Third Party Defendant's expert disclosures and reports must be served by **January 3, 2019**. All such reports shall be in the form and content as described above.
12. Expert depositions must be complete by **February 8, 2019**.
13. No expert shall testify at trial as to any opinions or base those opinions on fact not substantially disclosed in his or her report.

## III. FUTURE CONFERENCES

14. The Court will conduct telephone status conferences on **January 16, 2018 at 3:00 PM; on April 16, 2016 at 10:00 A.M. and on August 6, 2018 at 11:00 A.M.** Counsel for Plaintiff is directed to initiate the call to (609) 989-2144.
15. Counsel must confer at least 48 hours in advance of each Court appearance to confirm attendance and to review any matters to be discussed with the Court.

s/ Douglas E. Arpert  
**DOUGLAS E. ARPERT**  
**United States Magistrate Judge**